

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

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> OFFICE OF ECOSYSTEMS, TRIBAL AND PUBLIC AFFAIRS

November 2, 2009

John Allen, Forest Supervisor c/o Shane Jeffries, District Ranger 1230 N.E. 3rd St., Suite A-262 Bend, OR 97701

Subject:

EXF Thinning, Fuels Reduction, and Research Project.

EPA Project Number: 08-025-AFS

Dear Mr. Allen:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed EXF **Thinning**, **Fuels Reduction**, and **Research Project** on the Bend/Ft. Rock Ranger District of Deschutes National Forest in Deschutes County, Oregon. Our review was conducted in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

The DEIS analyzes the effects of implementing vegetation management and fuels reduction within the Lookout Mountain Unit of the Pringle Falls Experimental Forest. The layout of thinning, mowing, and underburning is based on the design of a research study plan written by the Pacific Northwest Research Station. The DEIS considers two action alternatives: Alternative 2 is the proposed action, and treats across 2,554, and Alternative 3 avoids activities within spotted owl habitat and Late Successional Reserves, and treats across 2,178 acres. Our review focused on Alternative 2.

As a participant on the Deschutes Provincial Advisory Committee (PAC), EPA has had the opportunity to survey other ongoing research efforts on the Pringle Falls Experimental Forest. This forest is an important natural laboratory that is serving to enhance our understanding of the role of natural and human-caused disturbances as agents of change in ponderosa pine, lodgepole pine and mixed conifer forests, and the degree to which they can be effectively managed to achieve or sustain desired ecological conditions. We are supportive of the proposed project, both as a means to address the risk of severe insect epidemic or catastrophic fire, and as an opportunity to study forest dynamics after thinning and fuels reduction in dry forests. Although a small component, we are appreciative that the long-term influence of climate change will be considered within the context of the study. As climate changes, so may the way in which fuel reduction treatments affect vegetation dynamics and forest structure. Research such as this can help to build our understanding and inform future management.

Based on our review, we are rating the DEIS as LO (Lack of Objections). We appreciate the opportunity to review and comment on the DEIS, and we look forward to furthering our understanding of this and other projects as we continue to participate on the PAC. If you have any questions about our review, please do not hesitate to contact me at (503)326-2859.

Sincerely,

/s/ Teresa Kubo, Acting Manager Environmental Review and Sediment Management Unit